

Exhibit 15.

1 CHRISTOPHER J. MERTENS
2 Email: cmertens@mmclegal.net
3 Miller, Mertens & Comfort, PLLC
4 1020 N. Center Parkway, Suite B
5 Kennewick, WA 99336
6 Telephone: (509) 374-4200
7 Fax: (509) 374-4229
8 Attorneys for Defendants Oasis
9 Physical Therapy, PLLC, Lance
10 Irvine and Mindi Irvine
11
12

13 UNITED STATES DISTRICT COURT
14
15 EASTERN DISTRICT OF WASHINGTON

16 AMERICAN CASUALTY CO. OF
17 READING, PA,

18 Plaintiff,

19 VS.

20 OASIS PHYSICAL THERAPY, PLLC,
21 MINDI IRVINE, LANCE IRVINE,
22 RAFAT SHIRINZADEH and YVONNE
23 SHIRINZADEH, KELLY COX,
24 SUSAN TABER and ANGELA HART,

25 Defendants.

NO. CV-08-5077-LRS

DEFENDANT OASIS PHYSICAL
THERAPY, PLLC, MINDI IRVINE,
AND LANCE IRVINE'S ANSWER
TO AMENDED COMPLAINT FOR
DECLARATORY RELIEF,
AFFIRMATIVE DEFENSES, AND
COUNTERCLAIM

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XX.

2 By way of answer to Paragraph 44 of the Amended Complaint, these
3 defendants are without sufficient information to admit or deny, and therefore deny
4 the same.

XXI.

8 By way of answer to Paragraph 45 of the Amended Complaint, these
9 defendants admit the same.

XXII.

12 By way of answer to Paragraph 46 of the Amended Complaint, these
13 defendants admit that American Casualty declined to defend Lance Irvine and
14 Yvonne Shirinzadeh, but deny that they do not qualify as insureds under the
15 Policy.

XXIII.

20 By way of answer to Paragraph 47 of the Amended Complaint, these
21 defendants deny the same.

Case 2:08-cv-05077-LRS Document 20 Filed 04/09/2009

- 1 4) For an award of damages herein, including actual damages, treble
- 2 damages, attorneys fees, and actual and statutory litigation costs under
- 3 RCW 48.30.015 and/or RCW 19.86.090;
- 4
- 5 5) For such other and further relief as the court deems just and equitable.

6 DATED this 9th day of April, 2009.

7 8 MILLER, MERTENS & COMFORT, PLLC

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10 By: /s/ Christopher J. Mertens
11 CHRISTOPHER J. MERTENS
12 WSBA #13591
13 1020 N. Center Pkwy, Ste. B
14 Kennewick, WA 99336
15 (509) 374-4200 (phone)
16 (509) 374-4229 (facsimile)
17 cmertens@mmclegal.net
18 Attorneys for Defendants Oasis Physical
19 Therapy, PLLC, Mindi Irvine
20 and Lance Irvine
21
22
23
24
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